

Appendix 3

Audit Commissions Protecting the Public Purse 2013

Checklist for Councillors and others responsible for governance

General		Yes	No
1	Do we have a zero-tolerance policy towards fraud?	✓	
Comments: Avoiding Bribery, Fraud & Corruption Policy Whistle blowing policy Money laundering policy			
2	Do we have the right approach, and effective counter-fraud strategies, policies and plans? Have we aligned our strategy with <i>Fighting Fraud Locally</i>	✓	
Comments: Housing fraud posters Housing Amnesty planned for Autumn 2014 Benefit fraud posters Internet Intranet, Fighting Fraud Locally to be redesigned for the new style Intranet. E-Learning designed for Avoiding Bribery Fraud and Corruption rolled out to all service areas			
3	Do we have dedicated counter-fraud staff?	✓	
Comments: Restructure of team. All staff now have a responsibility for Corporate Fraud in their JD's			
4	Do counter-fraud staff review all the work of our organisation?		✓
Comments: Benefits, Housing, RTB CTAX, CTRS, Internal staff issues. BRATES Links with procurement and licencing			
5	Does a Councillor have a portfolio responsibility for fighting fraud across the council?	✓	
Comments: Chair of Audit and Governance			
6	Do we receive regular reports on how well we are tackling fraud risks, carrying our plans and delivering outcomes?	✓	
Comments: Reports to A&G Committee Benchmarking with other LA's Audit Commission Annual Survey Internal Audit, PWC, Fraud Risk Assessment			

General		Yes	No
7	Have we assessed our management of counter-fraud work against good practice?	✓	
Comments: PPP guidance/good practice			
8	Do we raise awareness of fraud risks?		
a	With new staff (including agency staff)?	✓	
b	With existing staff?	✓	
c	With elected members?	✓	
d	With our contractors?	✓	
Comments: Avoiding Bribery Fraud and Corruption policy introduced at new staff induction, Existing staff are offered awareness sessions at team meetings. Fraud Awareness training for new starters in CS Refresher Fraud Awareness for CS Housing Fraud Awareness for Housing and RP's introduced. Agency staff signs agreement to work to the policy. Contractors, the policy forms part of contract. E-Learning introduced.			
9	Do we work well with national, regional and local networks and partnerships to ensure we know about current fraud risks and issues?	✓	
Comments: All LA's, NAFN, Police, UKBA, RP's, NHS, LAIOG			
10	Do we work well with other organisations to ensure we effectively share knowledge and data about fraud and fraudsters?	✓	
Comments: NAFN and CountyIntel bulletins TVP/UKBA/Other LA's			
11	Do we identify areas where our internal controls may not be performing as well as intended? How quickly do we then take action?	✓	
Comments: Internal controls, proactive checks Reactive cases of fraud, changes to processes, procedure implemented immediately			
12	Do we maximise the benefit of our participation in the Audit Commission National Fraud Initiative and receive reports on the matches investigated?	✓	
Comments: Some 20 cases from the 12/13 matches, remain opens. £160,000 savings recorded. Recently received Real Time matches received for SPD and Student Loans to Benefits are being worked on.			

General		Yes	No
13	Do we have arrangements in place that encourage our staff to raise their concerns about money laundering?	✓	
Comments: Policy & Procedure on intranet Money Laundering included in the Avoiding Bribery, Fraud and Corruption Policy and awareness training.			
14	Do we have effective arrangements for ;		
a.	reporting fraud?; and	✓	
b.	recording fraud?	✓	
Comments: The reporting form has been reviewed and redesigned to reflect the changes in reporting. The Suspicious Activity Report asks for additional information and is now reported to the National Crime authority.			
15	Do we have effective whistleblowing arrangements? In particular are staff:	✓	
a.	Aware of our whistle blowing arrangements?	✓	
b.	Have confidence in the confidentiality of those arrangements?	✓	
c.	Confident that any concerns raised will be addressed?	✓	
Comments: Reviewed to incorporate the changes as a result of the Enterprise and Regulatory Reform Bill 2013 Changes to arrangements issued in Council Matters a publication to all staff.			
16	Do we have effective fidelity insurance arrangements?	✓	
Comments:			
Fighting fraud with reduced resources			
17	Have we reassessed our fraud risks since the change in the financial climate?	✓	
Comments: Potential loss due to fraud in key areas assessed. Restructure of team Proposed Oxfordshire Fraud Hub Marketing Services to Registered Providers.			
18	Have we amended our counter-fraud action plan as a result?	✓	
Comments: Under review – see above			
19	Have we reallocated staff as a result?	✓	
Comments: Increased number of investigators for Housing Fraud Reducing allocated time to Housing Benefit Increased allocated resource to CTAX and other Corporate issues.			

Current risks and issues	Yes	No
Housing tenancy		
20 Do we take proper action to ensure that we only allocate social housing to those who are eligible?	✓	
Comments: Photos now part of sign up procedure Reviewed RTB process, introduced more checks at application. Proposed data matching of waiting lists. Housing Fraud awareness training offered to Housing Officers and RP's.		
21 Do we ensure that social housing is occupied by those to whom it is allocated?	✓	
Comments: 3.8 FTE housing tenancy fraud investigation officers Raised awareness with all Direct Service Team, Repairs, Gas Teams, Void Teams, Caretaking Service, who now report any concerns Fob entry properties – reports of usage, new fobs, lost fobs, requests for additional fobs Refurbish program of properties, list of respondents to letters where the person contacting the council is not the named tenant. Currently working through referrals from various sources Some proactive checking commenced, Call Credit Data Matching, resulted in 200 properties identified as at risk properties. Working with RP's		
Procurement		
22 Are we satisfied our procurement controls are working as intended?	✓	
Comments: Introduced the inclusion of the Avoiding Bribery, Fraud and Corruption Policy to contract in 2011. Financial Regulations and Contract Procedure Rules have been strengthened		
23 Have we reviewed our contract-letting procedures since the investigations by the Office of Fair Trading into cartels and compared them with best practice	✓	
Comments:		
Recruitment		
24 Are we satisfied our recruitment procedures achieve the following?		
a prevent us employing people working under false identities?	✓	
b confirm employment references effectively?	✓	
c ensure applicants are eligible to work in the UK?	✓	
d require agencies supplying us with staff to undertake the checks that we require?	✓	
Comments: Spot checks of existing staff ID. Diary dated checks procedure in place for work visa/permit dates.		
Current risks and issues	Yes	No
Personal Budgets		

25	Where we are expanding the use of personal budgets for adult social care, in particular direct payments, have we introduced proper safeguarding proportionate to risk and in line with recommended good practice?	
Comments: NA		
26	Have we updated our whistleblowing arrangements, for both staff and citizens, so that they may raise concerns about the financial abuse of personal budgets?	✓
Comments: Policy reviewed to incorporate changes in the Enterprise and Regulatory Reform Bill 2013 Report to Standards Committee		
Council Tax Discount		
27	Are we effectively controlling the discounts and allowances we give to council taxpayers?	✓
Comments: Checks currently are being carried out on SPD and Student exemption accounts.		
Housing benefit		
28	When tackling housing benefit fraud do we make full use of;	✓
a	National Fraud Initiative	✓
b	Department for work and Pensions Housing Benefit Matching Service	
c	Internal data matching; and	✓
d	Private sector data matching?	✓
Comments: No development of Housing benefit fraud issues due to the introduction of SFIS from 01/02/2015		
Emerging fraud risks		
29	Do we have appropriate and proportionate defences against emerging fraud risks:	
a	Business Rates;	✓
b	Right to Buy;	✓
c	Social fund and Local Welfare Assistance;	NA
d	Council Tax Reduction;	✓
e	School; and	NA
f	Grants?	✓
Comments: Appropriate recourse is dependent on forward plans post the transfer of posts in scope to the DWP Single Fraud Investigation Service		

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